IN THE JUSTICE COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF COCHISE, PRECINCT No. 1

STATE OF ARIZONA,	CASE NO. <u>CR2019</u>		
Plaintiff,	COMPLAINT		
vs. DOUGLAS PACKER,	JAN 1 8 2019		
Defendant(s).	COUNTY OF COCHISE BISBEE JUSTICE COURT PRECINCT #1		

The complainant herein, Lori Ann Zucco, Chief Criminal Deputy

County Attorney, pursuant to Rule 2.3, Rules of Criminal Procedure, on information and belief complains against:

DOUGLAS PACKER

and charge that in Justice Court Precinct No. 1

COUNT 1

On or between November 27th to 29th 2017, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: S.P., in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 2

On or between November 27th to 29th 2017, **DOUGLAS PACKER** committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: S.P., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

COUNT 3

On or about July 2018, **DOUGLAS PACKER** committed sexual assault by intentionally or knowingly engaging in sexual intercourse or oral sexual contact, without consent, to wit: digitally penetrated N.C., in violation of A.R.S. §§13-1406, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

COUNT 4

On or about July 2018, **DOUGLAS PACKER** committed kidnapping by knowingly restraining another person with intent to inflict death, injury or sexual offense to victim, to wit: restrained N.C. to inflict sexual offenses on her, in violation of A.R.S. §§13-1304, 13-1301, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

COUNT 5

On or about July 2018, **DOUGLAS PACKER** committed sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: touched N.C.'s breast, in violation of A.R.S. §§13-1404, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 6

On or about July 2018, **DOUGLAS PACKER** committed sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: touched N.C.'s genitals, in violation of A.R.S. §§13-1404, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 7

On or about July 2018, **DOUGLAS PACKER** committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: N.C., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

COUNT 8

On or about July 2018, **DOUGLAS PACKER** committed an aggravated assault while the victim was bound or otherwise physically restrained or while the victim's capacity to resist was substantially impaired, to wit: kissed N.C.without consent, in violation of A.R.S. §§13-1204.A.4, 13-1203.A.3 13-105, 13-701, 13-702, 13-703, and 13-801, a class 6 felony.

COUNT 9

On or about July 2018, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: N.C. the first time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 10

On or about July 2018, DOUGLAS PACKER attempted to commit sexual

assault by intentionally or knowingly engaging in sexual intercourse or oral sexual contact, without consent, to wit: attempted to sexually assault N.C., in violation of A.R.S. §§13-1406, 13-1401, 13-1001, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 3 felony.

COUNT 11

On or about July 2018, **DOUGLAS PACKER** attempted to commit sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: attempted to touch N.C.'s breast, in violation of A.R.S. §§13-1404, 13-1401, 13-1001, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 6 felony.

COUNT 12

On or about July 2018, **DOUGLAS PACKER** attempted to commit sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: attempted to touch N.C.'s genitals, in violation of A.R.S. §§13-1404, 13-1401, 13-1001, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 6 felony.

COUNT 13

On or about July 2018, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: N.C. the second time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

DATED this 12 day of January, 2019.

COCHISE COUNTY ATTORNEY

BY:

Lori Ann Zucco Chief Criminal

Deputy County Attorney

JUSTICE COURT PRECINCT No. 1

State of Arizona v. DOUGLAS PACKER							
Check One							
 48 Hour Complaint Issue Summons If it becomes necessary to issue a warrant for the Defendant's arrest the State request that the warrant be ACIC NCIC Requested Bond Amount \$ Hold off issuing Summons Issue Warrant ACIC NCIC Requested Bond Amount \$ 							
☐ PURSUANT TO A.R.S. § 13-3961(A)(5)(a)(ii), NO BOND IS TO BE SET ☐ In custody on other charges Statement of Factual Basis for Issuance of Warrant:							
DEFENDANT: DOUGLAS PACKER							
Address: Cochise County Jail, Bisbee, AZ 85603							
Race: Ht. Eyes:	Caucasian 6'01" Hazel	Sex: Wt: SSN:	Male 192 lbs.	DOB: Hair: Occupation	05/1955 Brown		
Work Address:							
Phone Number(s):							
Additional information that will assist in locating the defendant:							
Law Enforcement Agency: CCSO							
DR# 19-00430							